

Objection Deadline: November 22, 2017 at 4:00 p.m.
Presentment Date and Time: November 27, 2017 at 4:00 p.m.
Hearing Date and Time (if needed): November 30, 2017 at 10:00 a.m.

ROPS & GRAY LLP
Gregg M. Galardi
Joshua Y. Sturm
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090

*Counsel to the Plan Administrator
for the Debtors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----x	
	:
In re	:
	Chapter 11
	:
Gawker Media LLC, <i>et al.</i> , ¹	:
	Case No. 16-11700 (SMB)
	:
Debtors.	:
	(Jointly Administered)
	:
-----x	

**NOTICE OF PRESENTMENT OF ORDER PURSUANT TO RULE 2004
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
AUTHORIZING THE PLAN ADMINISTRATOR TO CONDUCT
DISCOVERY CONCERNING POTENTIAL CAUSES OF ACTION AND
TO ESTABLISH DISCOVERY RESPONSE AND DISPUTE PROCEDURES**

PLEASE TAKE NOTICE that on October 11, 2016, Gawker Media LLC (“Gawker Media”), Gawker Media Group, Inc. (“GMGI”), and Gawker Hungary Kft. (“Gawker Hungary”), as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), filed the *Motion of the Debtors for Leave Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure to Conduct Discovery*

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Plan Administrator, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

Concerning Potential Plan Issues and Potential Causes of Action, and to Establish Discovery Response and Dispute Procedures [Docket No. 341] (the “Motion”);²

PLEASE TAKE FURTHER NOTICE that on June 28, 2017, the Court issued its *Corrected Memorandum Decision Granting In Part and Denying In Part Plan Administrator’s Motion for Leave to Conduct a Rule 2004 Examination* [Docket No. 936] (the “2004 Decision”);

PLEASE TAKE FURTHER NOTICE that pursuant to the 2004 Decision, the Court directed the plan administrator for the Debtors (the “Plan Administrator”) and the parties that objected to the Motion (the “Objecting Parties”) to meet and confer with a view to submitting an order setting forth the Plan Administrator’s requests and specific limitations on those requests (a “2004 Order”);

PLEASE TAKE FURTHER NOTICE that the Plan Administrator and the Objecting Parties have met and conferred, but have been unable to agree to a consensual form of a 2004 Order;

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit A is the Plan Administrator’s form of proposed 2004 Order (the “Proposed 2004 Order”);

PLEASE TAKE FURTHER NOTICE that responses or objections (“Objections”) to the Proposed 2004 Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and include a counter-proposed form of 2004 Order, a blackline showing the changes to the

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Proposed 2004 Order and the specific grounds for such changes, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **November 22, 2017 at 4:00 p.m. (prevailing Eastern Time)** (the "Objection Deadline"), upon (i) the Plan Administrator for the Debtors, Attn: William D. Holden (profinvoices@gawker.com); (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel for the IRS, Andrew E. Krause, United States Attorney's Office Southern District of New York, 86 Chambers Street, 3rd Floor, New York, New York 10007; and (v) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002;

PLEASE TAKE FURTHER NOTICE that, if no Objections are received by the Objection Deadline, the undersigned will present the Proposed 2004 Order to the Court for signature on **November 27, 2017 at 4:00 p.m. (prevailing Eastern Time)**; and

PLEASE TAKE FURTHER NOTICE that if any timely Objections are filed to the Proposed 2004 Order and the Plan Administrator and Objecting Parties are unable to consensually resolved such Objection(s), a hearing will be held before the Honorable Stuart M. Bernstein, in the United States Bankruptcy Court for the Southern District of

New York, One Bowling Green, Courtroom 723, New York, New York 10004, on

November 30, 2017 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”); and

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing. The Plan Administrator will file an agenda before the Hearing, which may modify or supplement the matters to be heard at the Hearing.

Dated: November 9, 2017
New York, New York

/s/ Gregg M. Galardi
ROPES & GRAY LLP
Gregg M. Galardi
Joshua Y. Sturm
1211 Avenue of the Americas
New York, NY 10036-8704
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
gregg.galardi@ropesgray.com
joshua.sturm@ropesgray.com

*Counsel to the Plan Administrator
for the Debtors*